

Exhibit F

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

JUANA CRUZ, OFELIA)
BENAVIDES, JOSE ELIAS)
N.G, GABRIELA VELAZQUEZ,)
HELESIO CRUZ, ANGELICA)
CHAVEZ, CONCEPCION PEREZ,)
OLGA PEREZ, MAVRIGO)
SAENZ, JORGE MAOLEON,)
HECTOR SANCHEZ, HECTOR)
GONZALEZ, YESSY PEREZ)
MARTINEZ, MARIA DE)
LOURDES CRUZ, RESENDO)
LIEVANOS, ELIZABETH LARA,)
LUIS ALBERTO ZUNIGIA)
CASTILLO, MIGUEL)
CABALLERO SANCHEZ, CARLOS)
DANIEL LOPEZ, GILDA)
RIVAS, ARMANDO MORALES DE)
LLANO, LAZARO GARCIA,)
MARIA DE JESUS MEDINA,)
RICHARD ESQUIVEL, RAFAEL)
SANCHEZ, GUILLERMO RUIZ,)
ROSA QUINTANILLA,)

CASE NO: 7:23-CV-00343

JURY DEMANDED

PLAINTIFFS,)

VS.)

DELGAR FOODS, LLC A/K/A)
DELIA'S TAMALES,)

DEFENDANT.)

ORAL DEPOSITION OF
OLGA PEREZ
June 26, 2024

ORAL DEPOSITION of OLGA PEREZ, produced
as a witness at the instance of the Defendant, and duly
sworn, was taken in the above-styled and numbered cause

1 on the 26th day of June 2024, from 10:48 a.m. to
2 1:59 p.m., before Priscilla R. Maldonado, CSR, in and
3 for the State of Texas, reported by machine shorthand,
4 at the Law Offices of Ricardo Gonzalez, 124 S. 12th Ave,
5 Edinburg, Texas, pursuant to the Federal Rules of Civil
6 Procedure and the provisions stated on the record or
7 attached.

A P P E A R A N C E S

COUNSEL FOR THE PLAINTIFFS:

RICARDO GONZALEZ
OXFORD & GONZALEZ
124 SOUTH 12TH AVENUE
EDINBURG, TEXAS 78539
Tel: 956-383-5654
RIC@OXFORDGONZALEZ.COM

COUNSEL FOR THE DEFENDANT:

STEPHEN J. QUEZADA
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
500 DALLAS ST., STE 3000
HOUSTON, TEXAS 77002
Tel: 713-655-5757
STEPHEN.QUEZADA@OGLETREE.COM

LORENA D. VALLE
PORTER HEDGES LLP
1000 MAIN STREET, 36TH FLOOR
HOUSTON, TEXAS 77002-6341
Tel: 713-226-6000
LVALLE@PORTERHEDGES.COM
ELIZABETH SANDOVAL CANTU
RAMON WORTHINGTON NICOLAS & CANTU, PLLC
1506 SOUTH LONE STAR WAY, SUITE 5
EDINBURG, TEXAS 78539
Tel: 945-294-4800
ECANTU@RAMONWORTHINGTON.COM

ALSO PRESENT:

NICOLAS GIBLER, INTERPRETER
MIGUEL CABALLERO, PLAINTIFF
LUIS ZUNIGA, PLAINTIFF
ARMANDO MORALES DE LLANO, PLAINTIFF

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1 Q. Okay. There's an allegation in this case about
2 Delia's keeping two sets of books. Are you aware of
3 that allegation?

4 A. No.

5 Q. Do you know if Delia's used two sets of books?

6 A. No. I do not know about that.

7 Q. Okay. Do you know if -- well, do you know who
8 Delia Garza or Delia Lubin is?

9 A. Delia Lubin is Ms. Delia, the one from Delia's
10 Tamales.

11 Q. Correct. Yes. Do you know -- can we call her
12 Ms. Delia?

13 A. Yeah. Yes.

14 Q. Do you know if Ms. Delia set your pay?

15 A. I don't know.

16 Q. Do you know if Ms. Delia made any decisions
17 about your employment at all?

18 A. No. I do not know.

19 Q. Do you know if Ms. Delia made any decisions
20 about anything with regard to how you did your job, or
21 what your duties were?

22 A. Give me that again?

23 Q. Yeah. Do you know if Ms. Delia made any
24 decisions about what job duties you were to do?

25 A. Well, I would imagine that did not -- that she

1 did not make those decisions, but she has her employees
2 that probably make those decisions for her, like her
3 managers and supervisors.

4 Q. Okay. Sitting here today, you can't tell us
5 that Ms. Delia made those decisions about you?

6 A. No. I do not know.

7 Q. I'd like to go back to the skin condition if I
8 could for just one moment. You never made any claim for
9 workers' compensation while working for Delia's, right?

10 A. No.

11 Q. And nobody ever said that you couldn't -- or
12 that you shouldn't; is that right?

13 A. No.

14 Q. Nobody said that, correct?

15 A. No.

16 Q. Yes, it's correct?

17 A. Yes. It's correct. Nobody told me that.

18 Q. Okay. Got it. What damages are you asking for
19 in this lawsuit?

20 A. I'm not claiming any damages, my lawyer is in
21 charge of that.

22 Q. Fair enough. For how long after you were
23 separated from Delia's, were you unemployed?

24 A. Two weeks.

25 Q. And during those two weeks, did you receive any

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24 decisions about what job duties you were to do?

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